

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE: INTEL CORP. MICROPROCESSOR ANTITRUST LITIGATION))))))	MDL Docket No. 05-1717 (JJF)
PHIL PAUL, on behalf of himself and all others similarly situated,)))	C.A. No. 05-485-JJF
Plaintiffs,))	CONSOLIDATED ACTION
v.)))	
INTEL CORPORATION,)))	
Defendant)	

**DEFENDANT INTEL CORPORATION'S RESPONSE TO
PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, defendant INTEL CORPORATION (“Intel”) hereby responds to Class Plaintiffs’ First Request for Production of Documents.

GENERAL RESPONSE

1. Intel's responses herein are not intended to, nor do they, constitute a waiver of the following rights, and are in fact intended to preserve and do preserve the following:

a. the right to object to the admissibility of any document produced pursuant to these Requests on grounds of authenticity, foundation, relevance, materiality, privilege, or any other objection which may arise in subsequent proceedings in, or trial of, this or any other action;

b. the right to object to plaintiffs' use of any document produced pursuant to this set of Requests, including pursuant to the terms of the protective order that may be entered in this case, in any subsequent proceeding in, or trial of, this or any other action;

c. the right to object on any grounds at any time to any other discovery involving documents produced pursuant to this set of Requests; and

d. the right to amend these responses in the event that any documents are unintentionally omitted from production. Inadvertent identification or production of privileged documents or information by Intel pursuant to these Requests does not constitute a waiver of any applicable privilege.

2. Nothing contained herein or provided in response to the Requests consists of, or should be construed as, an admission relating to the existence or nonexistence of any alleged facts or information referenced in any Request or that Intel is in agreement with plaintiffs' characterization of the facts in any such Request. By indicating that Intel will produce any responsive documents, Intel does not represent that such documents exist or are in its possession, custody, or control but only that it will conduct the searches indicated for the documents sought.

3. The parties are currently negotiating agreements governing the scope of searches required to locate responsive documents, including appropriately limiting the custodians whose files would need to be searched for responsive documents ("Stipulation Regarding Document Production Protocol"). In response to certain Requests that are essentially corporate inquiries, Intel states that in addition to its corporate files it will search the files of the custodians identified in the Stipulation Regarding Document Production Protocol. Intel notes, however, that these custodians were not identified for the purpose of responding to Class Plaintiffs' corporate inquiries.

4. Consistent with its obligation under the Federal Rules of Civil Procedure, Intel will make reasonable efforts to respond to each Request, to the extent that no objection is made, as Intel understands and interprets the request. If plaintiffs subsequently assert an interpretation of any Request that differs from that of Intel's, Intel reserves the right to supplement its objections and responses and to produce and use additional documents.

5. Intel makes the following responses upon presently available information and without prejudice to Intel's right to utilize subsequently discovered facts or documents.

GENERAL OBJECTIONS

1. Intel objects to each Request herein to the extent that it seeks documents or information protected from disclosure by the attorney-client privilege, work product doctrine, joint defense privilege, or any other applicable privilege.

2. Intel objects to Class Plaintiffs' "Definitions," "Instructions," and "Requests for Production" to the extent that they impose or attempt to impose obligations beyond those required by the Federal Rules of Civil Procedure and the Local Rules of the District of Delaware.

3. Intel objects to every Request herein to the extent that it seeks confidential, proprietary, trade secret, or competitively sensitive information. Intel will not produce any such documents until the parties enter an appropriate protective order that strictly limits the dissemination, use and disclosure of confidential, proprietary, trade secret, or other competitively sensitive information.

4. Intel objects to each Request herein to the extent that it seeks the production of any documents that relate to companies located or doing business outside the United States. Subject to this objection, Intel currently intends to produce documents that may relate to companies located or doing business outside the United States. Intel specifically reserves the right to amend these responses if the Court determines that it lacks subject matter jurisdiction over any part of the allegations that Class Plaintiffs assert in this Action.

5. Intel objects to each Request herein to the extent that it is argumentative and/or calls upon Intel to interpret legal theories or to draw legal conclusions.

6. Intel objects to each Request herein to the extent that the documents requested already are in Class Plaintiffs' possession or are available to plaintiffs from another source that is more convenient, less burdensome, or less expensive.

7. Intel objects to the definition of "INTEL" "YOU" and "YOUR" as imposing obligations on Intel beyond those authorized by the Federal Rules of Civil Procedure and as purporting to require Intel to produce documents that are not within its possession, custody, or control. In this regard, Intel objects to the definition of "INTEL", "YOU", and "YOUR" as

including “all past and present officers, directors, agents, representatives, employees, consultants, attorneys, entities acting in joint venture or partnership relationships with defendants, and others acting on either of their behalf.”

8. Intel objects to the definition of “AMD” as imposing obligations on Intel beyond those authorized by the Federal Rules of Civil Procedure. In this regard, Intel objects to the definition of “AMD” as including “all past and present officers, directors, agents, representatives, employees, consultants, attorneys, entities acting in joint venture or partnership relationships with them, and others acting on either of their behalf.”

9. Intel objects to the definition of “INTEL PARTNER” as vague, ambiguous, overbroad and not subject to reasonable interpretation as it seeks to include “any company that designs, develops, manufactures, or sells any hardware, software, or any other product that is compatible for use with, or support of, any INTEL or AMD MICROPROCESSOR in a COMPUTER SYSTEM.” Intel’s response to any Request concerning an “INTEL PARTNER” will be limited to those companies that design, develop, manufacture, or sell Intel microprocessors and/or chipsets.

10. Intel objects to the definition of “SKYPE” as vague, ambiguous and imposing obligations on Intel beyond those authorized by the Federal Rules of Civil Procedure. In this regard, Intel objects to the definition of “SKYPE” as including “all past and present officers, directors, agents, representatives, employees, consultants, attorneys, entities acting in joint venture or partnership relationships with them, and others acting on either of their behalf.”

11. Intel objects to Instructions 4-10 to the extent that they purport to impose on Intel obligations that go beyond those authorized by the Federal Rules of Civil Procedure or that are unduly burdensome. In this regard, Intel objects to Class Plaintiffs’ demand that all documents maintained or stored electronically be produced in “native electronic format with all relevant metadata intact.” The Parties to these actions, including the Class Plaintiffs, have submitted for Court approval a Proposed Amended Stipulation Regarding Electronic Discovery and Format of Document Production. Intel intends to produce any responsive documents maintained or stored

electronically consistent with the inspection and production protocols set forth in that Stipulation.

12. Intel's responses herein are predicated upon the parties finalizing the Stipulation Regarding Document Production Protocol. To the extent the parties are unable to ultimately reach agreement on the Stipulation Regarding Document Production Protocol, and in particular an appropriate agreement limiting the scope of the custodians whose files need to be searched for responsive documents, Intel objects to each Request herein that is not limited to documents "sufficient to show" the requested information on the grounds that the Request is overly broad and unduly burdensome.

13. Each and all of the foregoing General Objections are hereby expressly incorporated into each and all of the following specific responses. For particular emphasis, one or more of these General Objections may be reiterated in a specific response. The absence of any reiteration in a given specific response is neither intended as, nor shall be construed as, a limitation or waiver of any General Objection made herein. Moreover, the inclusion of a specific objection to a specific response is neither intended as, nor shall be construed as, a limitation or waiver of a General Objection or any other specific objection.

SPECIFIC OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All studies, analyses, presentations or investigations concerning actual or potential competition faced by INTEL with respect to its MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 2:

All studies, analyses, presentations or investigations concerning the nature or size of the market for MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 3:

All studies, analyses, presentations or investigations concerning AMD's market share or market position with respect to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodial.

REQUEST FOR PRODUCTION NO. 4:

All studies, analyses, presentations or investigations concerning INTEL's market share or market position with respect to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian

REQUEST FOR PRODUCTION NO. 5:

All DOCUMENTS discussing, reflecting or constituting the terms of INTEL's sale of MICROPROCESSORS to any OEM, including but not limited to agreements, draft agreements, side letters, memoranda of understanding, memos, correspondence, internal analyses, sales meeting summaries, price lists, and invoices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for all paper "invoices" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodial.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any OEM concerning the sale, promotion and/or advertisement of MICROPROCESSORS and/or COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of all appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained

in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 7:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any OEM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 8:

All DOCUMENTS discussing, reflecting, constituting, analyzing, summarizing or describing any advertising and/or marketing support provided by INTEL to any OEM, including but not limited to invoices, canceled checks, correspondence, guidelines, conditions and/or agreements concerning MDF, Intel Inside, any other cooperative advertising support, or any other form of rebate or price discount provided by INTEL to any OEM in connection with advertising or marketing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that the demand for all paper “invoices” and “canceled checks” is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 9:

All DOCUMENTS discussing, reflecting, constituting or describing the price of INTEL MICROPROCESSORS offered or sold to any OEM, including but not limited to price lists, price analyses, average selling price calculations, price negotiations and correspondence.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 10:

DOCUMENTS sufficient to show the actual or effective prices paid, accounting for all FINANCIAL INDUCEMENTS, by all OEMs for INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS constituting, discussing or reflecting any analysis of MICROPROCESSOR sales to OEMs, including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 12:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL

INDUCEMENT or NON-FINANCIAL INDUCEMENT to any OEM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 13:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any OEM regarding AMD, AMD MICROPROCESSORS and/or COMPUTER SYSTEMS containing AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 14:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any RETAILER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 15:

All DOCUMENTS discussing, reflecting, constituting or describing payments, commissions, or "spiffs" paid by RETAILERS to salespeople based on sales of COMPUTER SYSTEMS containing INTEL and/or AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 16:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any RETAILER related to the allocation of shelf space or product placement in a RETAILER's stores.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 17:

All DOCUMENTS discussing, reflecting, constituting, analyzing, summarizing or describing any advertising and marketing support provided by INTEL to a RETAILER, including but not limited to invoices, canceled checks, correspondence, guidelines, conditions, and agreements concerning MDF, Intel Inside, any other cooperative advertising support, or any other form of rebate or price discount provided by INTEL to any RETAILER in connection with advertising or marketing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that the demand for all paper "invoices" and "canceled checks" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to its General Objections, its Specific Objections, the

parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 18:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any RETAILER concerning the stocking, advertising, promotion or sale of COMPUTER SYSTEMS containing AMD or INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 19:

All DOCUMENTS constituting, discussing or reflecting any analysis of retail sales of COMPUTER SYSTEMS containing AMD or INTEL MICROPROCESSORS, including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 20:

All DOCUMENTS constituting, discussing or reflecting any analysis of direct internet sales of COMPUTER SYSTEMS containing AMD or INTEL MICROPROCESSORS, including but not limited to projections, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any RETAILER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive document and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 22:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any RETAILER regarding AMD, AMD MICROPROCESSORS and/or COMPUTER SYSTEMS containing AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 23:

All DOCUMENTS discussing, reflecting or constituting the terms of INTEL's sale of MICROPROCESSORS to any DISTRIBUTOR, including but not limited to agreements, draft agreements, side letters, memoranda of understanding, memos, correspondence, internal analyses, sales meeting summaries, price lists, and invoices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for all paper "invoices" is unduly burdensome and overbroad. Intel does not intend to produce such documents. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of all appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 24:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any DISTRIBUTOR concerning the sale, promotion and/or advertisement of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order

governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 25:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered or provided by INTEL to any DISTRIBUTOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 26:

All DOCUMENTS discussing, reflecting, constituting, analyzing, summarizing or describing any advertising and/or marketing support provided by INTEL to any DISTRIBUTOR, including but not limited to invoices, canceled checks, correspondence, guidelines, conditions and/or agreements concerning MDF, Intel Inside, any other cooperative advertising support, or any other form of rebate or price discount provided by INTEL to any DISTRIBUTOR in connection with advertising or marketing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that the demand for all paper “invoices” and “canceled checks” is overly broad and unduly burdensome. Intel does not intend to produce such documents.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 27:

All DOCUMENTS discussing, reflecting, constituting or describing the price of INTEL MICROPROCESSORS offered or sold to any DISTRIBUTOR, including but not limited to price lists, price analyses, average selling price calculations, price negotiations and correspondence.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 28:

DOCUMENTS sufficient to show the actual or effective prices paid, accounting for all FINANCIAL INDUCEMENTS, by all DISTRIBUTORS for INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 29:

All DOCUMENTS constituting, discussing or reflecting any analysis of MICROPROCESSOR sales to or by DISTRIBUTORS, including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 30:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any DISTRIBUTOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 31:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any DISTRIBUTOR regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, aid the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 32:

All DOCUMENTS discussing, reflecting or constituting the terms of INTEL's sale of MICROPROCESSORS to any ODM, including but not limited to agreements, draft agreements, side letters, memoranda of understanding, memos, correspondence, internal analyses, sales meeting summaries, price lists, and invoices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for all paper "invoices" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 33:

All DOCUMENTS constituting, discussing, reflecting, constituting or describing communications between INTEL and any ODM concerning the sale of MICROPROCESSORS and/or the design or development of COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of all appropriate protective order

governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 34:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian..

REQUEST FOR PRODUCTION NO. 35:

All DOCUMENTS discussing, reflecting, constituting or describing the price of INTEL MICROPROCESSORS offered or sold to any ODM, including but not limited to price lists, price analyses, average selling price calculations, price negotiations, and correspondence.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation

Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 36:

DOCUMENTS sufficient to show the actual or effective prices paid, accounting for all FINANCIAL INDUCEMENTS, by all ODMs for INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 37:

All DOCUMENTS constituting, discussing or reflecting any analysis of MICROPROCESSOR sales to ODMs including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained

in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 38:

All DOCUMENTS dismissing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 39:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any ODM regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, development, design, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order

governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 40:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any CHIPSET manufacturer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 41:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any CHIPSET manufacturer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation

Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 42:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any CHIPSET manufacturer regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, design, development, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 43:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full, Intel further objects to this Request on the grounds that the term “INTEL PARTNER” is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 44:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term “INTEL PARTNER” is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 45:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any INTEL PARTNER regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, product launches, design, development, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term “INTEL PARTNER” is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 46:

All DOCUMENTS prepared for or in connection with distribution to customers and prospective customers at any trade show.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request as overly broad and unduly burdensome, in part because it is not limited to the issues in this action. Intel also objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 47:

All DOCUMENTS constituting, analyzing or discussing business plans for INTEL's MICROPROCESSOR business, including but not limited to plans for specific market segments, MICROPROCESSOR types, and/or specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 48:

All DOCUMENTS analyzing or discussing INTEL's and/or AMD's market share in the MICROPROCESSOR business, including but not limited to market share for specific market segments, MICROPROCESSOR types, and/or in specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 49:

All DOCUMENTS constituting, analyzing or discussing strategic plans, competitive analyses, sales forecasts, price elasticity studies, and market segmentation analyses related to INTEL or AMD's MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full.. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 50:

All DOCUMENTS constituting, analyzing or discussing pricing analyses or pricing studies related to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 51:

All DOCUMENTS referring, relating, or pertaining to any INTEL analyst meeting, including but not limited to meeting transcripts, notes or minutes, pre-meeting mailings, and materials distributed at or during the meeting.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 52:

All presentations, conference calls, or other communications by INTEL representatives to financial analysts, industry forums, the press, or any other third parties that relate to

MICROPROCESSORS, YOUR business or financial performance, or AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 53:

All DOCUMENTS referring, relating, or pertaining to any INTEL shareholder meeting, including but not limited to meeting transcripts, notes or minutes, pre-meeting mailings, and materials distributed at or during the meeting.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive document and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 54:

All DOCUMENTS constituting, reflecting or pertaining to press releases about INTEL MICROPROCESSORS, including but not limited to drafts of such releases, discussions about such drafts, final versions of such releases, and communications or discussions about such releases.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 55:

All DOCUMENTS discussing customer or consumer demand for MICROPROCESSORS, including but not limited to demand in specific market segments, by MICROPROCESSOR type, and/or in specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 56:

All DOCUMENTS analyzing, constituting, discussing, reflecting or referring to INTEL's sales goals, forecasts, projections and/or performance for INTEL's MICROPROCESSOR business, including but not limited to specific market segments, MICROPROCESSOR types, and/or specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 57:

All DOCUMENTS analyzing, describing, or reflecting INTEL's platform strategy for Centrino, VIIV, East Fork, and the Digital Home Initiative, including but not limited to the benefits to INTEL and potential harm to AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained

in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 58:

All DOCUMENTS discussing, analyzing or referring to competition between OEMs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 59:

All DOCUMENTS discussing, analyzing or referring to competition between RETAILERS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server.; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 60:

All DOCUMENTS discussing, analyzing or referring to competition between DISTRIBUTORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian

REQUEST FOR PRODUCTION NO. 61:

All DOCUMENTS discussing, analyzing or referring to competition between ODMs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 62:

All DOCUMENTS discussing, analyzing or referring to competition between INTEL, on the one hand, and AMD or any other MICROPROCESSOR manufacturer, on the other hand, with respect to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 63:

All DOCUMENTS discussing, analyzing or referring to INTEL or AMD's capacity to manufacture MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 64:

All DOCUMENTS discussing or referring to INTEL's or AMD's ability, inability, capacity or lack of capacity to produce or supply MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 65:

All DOCUMENTS describing, analyzing or summarizing INTEL's actual or projected costs to design, manufacture, sell, distribute, promote or market (including but not limited to market development activities) INTEL MICROPROCESSORS, including but not limited to any such DOCUMENTS describing, analyzing or summarizing such costs with respect to any particular customer or customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 66:

DOCUMENTS sufficient to show all fixed asset or other capital expenditures relating to YOUR manufacture or sale of MICROPROCESSORS, together with related depreciation and asset disposition schedules, from January 1, 1997 to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 67:

All budgets, forecasts, and projections concerning any of the actual or potential elements of the business of manufacturing or selling MICROPROCESSORS including, but not limited to (1) costs and expenses, (2) sales in units or dollars, (3) gross and net profits, and (4) return on investment associated with YOUR expenditures for the construction, or expansion, or contracting of production facilities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 68:

All financial reports, studies or analyses of INTEL's MICROPROCESSOR business with respect to any particular customer or customers, including but not limited to financial reports, studies or analyses of INTEL's projected and/or actual profits or economic performance with respect to such customer or customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 69:

DOCUMENTS sufficient to describe the meaning, significance or protocols applicable to any color coding of any technical manual or specification provided by INTEL to any INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order

governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged document sufficient to describe the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 70:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS shipped to or within the United States, broken down by date, customer and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 71:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS sold to customers incorporated in or with the ir principal place of business in the United States, broken down by date, customer, and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 72:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS shipped to or within California, broken down by date, customer and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 73:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS sold to companies incorporated in or with their principal place of business in California, broken down by date, customer and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged document sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 74:

All studies, analyses, presentations or investigations concerning the profitability of INTEL's MICROPROCESSOR business, including but not limited to studies, analyses, presentations or investigations concerning the profitability of INTEL's MICROPROCESSOR business with individual customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 75:

All DOCUMENTS constituting, discussing or referring to any limitation or restriction on an INTEL customer's or INTEL PARTNER's ability to purchase, promote, advertise, develop, design or sell AMD MICROPROCESSORS or products containing or compatible with AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 76:

All DOCUMENTS discussing, referring to or analyzing the combined or package sale of INTEL MICROPROCESSORS, INTEL CHIPSETs and/or INTEL motherboards.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 77:

All DOCUMENTS analyzing, discussing or referring to the provision of free or discounted CHIPSETs, or any other free or discounted INTEL product, in connection with the sale of a MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 78:

All DOCUMENTS discussing or referring to server bids to end users, included but not limited to bids to commercial end users, government entities and/or universities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 79:

All DOCUMENTS discussing or referring to INTEL's direct or indirect subsidization (through FINANCIAL INDUCEMENTS or other financial support) of Dell's, IBM's or any other OEM's server bids to end users, included but not limited to bids to commercial end users, government entities and/or universities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in fill. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 80:

All DOCUMENTS discussing or referring to the priority in which INTEL customers receive MICROPROCESSORS during supply shortages.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 81:

All DOCUMENTS discussing or referring to the priority in which INTEL customers receive INTEL product and/or technological information.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 82:

All DOCUMENTS constituting or reflecting INTEL's methodology for assignment of "Tier One" or other preferred INTEL customer status with respect to MICROPROCESSOR customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 83:

All DOCUMENTS constituting or reflecting communications with any OEM concerning its actual or potential loss of "Tier One" or other preferred INTEL customer status as a result of the actual or contemplated purchase of AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 84:

All DOCUMENTS constituting, reflecting, or pertaining to any consideration or discussion within INTEL of the relationship with or business plans for a particular customer or customers in general.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 85:

All DOCUMENTS constituting, reflecting or pertaining to any consideration within INTEL of withdrawing or withholding "Tier One" or other preferred INTEL customer status as a result of an OEM's actual or contemplated purchase of AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 86:

All DOCUMENTS constituting or reflecting internal discussion or other communications within INTEL concerning the purposes, objectives, criteria or implications for assigning INTEL's MICROPROCESSOR customers into "tiers."

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 87:

All DOCUMENTS constituting or reflecting INTEL's criteria for assignment of MICROPROCESSOR customers into "tiers."

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 88:

All DOCUMENTS constituting or reflecting INTEL's criteria for designating a MICROPROCESSOR customer as a "Tier One," "strategic" or other preferred customer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 89:

DOCUMENTS sufficient to show the "tier" or other status assigned by INTEL to each of its MICROPROCESSOR customers at any time since January 1, 2000.

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 90:

All DOCUMENTS discussing or referring to E-CAP and/or “meeting competition” or “meet comp” payments or credits to any INTEL MICROPROCESSOR customer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 91:

All DOCUMENTS discussing or referring to INTEL’s providing or paying for engineering, sales, or technical support for or for the benefit of OEMs, ODMs, CHIPSET manufacturers, RETAILERS, or any other INTEL MICROPROCESSOR customer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 92:

All INTEL internal guidelines, policies, practices and procedures, in effect at any time since January 1, 2000, applicable or pertaining to INTEL sales or marketing practices with respect to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian

REQUEST FOR PRODUCTION NO. 93:

All INTEL internal guidelines, policies, practices and procedures, in effect at any time since January 1, 2000, applicable or pertaining to the offer, use or payment of any FINANCIAL INDUCEMENT in connection with INTEL's offer or sale of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 94:

All INTEL internal guidelines, policies, practices and procedures, in effect at any time since January 1, 2000, applicable or pertaining to the Intel Inside program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive document and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 95:

All INTEL internal guidelines, policies, practices and procedures, in effect at any time since January 1, 2000, pertaining to antitrust compliance.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive document and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 96:

All INTEL internal guidelines, policies, practices and procedures, in effect at any time since January 1, 2000, applicable or pertaining to MICROPROCESSOR pricing (including discounts, rebates and E-CAP).

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 97:

All INTEL internal guidelines, policies, practices and procedures, in effect at any time since January 1, 2000, applicable or pertaining to INTEL's offer, use, or payment of any FINANCIAL INDUCEMENT to RETAILERS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive document and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 98:

All INTEL internal guidelines, policies, practices and procedures, in effect at any time since January 1, 2000, applicable or pertaining to INTEL's financial statement accounting for FINANCIAL INDUCEMENTS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 99:

All DOCUMENTS analyzing, studying or reporting on INTEL's provision of FINANCIAL INDUCEMENTS and/or NON-FINANCIAL INDUCEMENTS to any INTEL MICROPROCESSOR customer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 100:

All DOCUMENTS analyzing, discussing or referring to INTEL's accounting treatment for any FINANCIAL INDUCEMENT provided to an INTEL MICROPROCESSOR customer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to the Request on the grounds that it is overly broad and unduly burdensome. Based upon the parties' meet and confer, Intel understands that this Request is limited to documents reflecting or discussing Intel's policy regarding the accounting issue referenced, and does not include documents reflecting or relating to the execution of such policy.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, and Intel's understanding of the Request based upon the parties' meet and confer, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 101:

All DOCUMENTS analyzing or discussing whether sales rebates, bonuses, advertising support payment, market development funds or Intel Inside funds should be treated as a marketing expense or revenue reduction.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is overly broad and unduly burdensome. Based upon the parties' meet and confer, Intel understands that this Request is limited to documents reflecting or discussing Intel's policy regarding the accounting issue referenced, and does not include documents reflecting or relating to the execution of such policy.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, and Intel's understanding of the Request based upon the parties' meet and confer, Intel will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 102:

All DOCUMENTS constituting or relating to sales or marketing training programs given to INTEL employees with responsibility for MICROPROCESSOR sales or marketing at any time since January 1, 2000.

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document

Production Protocol, including files maintained by such Custodians on any shared server; and
(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 103:

All DOCUMENTS constituting or relating to antitrust compliance training programs given to INTEL employees with responsibility for MICROPROCESSOR sales or marketing at any time since January 1, 2000.

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and
(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 104:

All DOCUMENTS constituting or relating to training programs given to INTEL employees at any time since January 1, 2000 concerning the use of any FINANCIAL INDUCEMENT in connection with the offer or sale of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained

in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 105:

DOCUMENTS sufficient to describe the method or structure of compensation provided to INTEL sales personnel, including the provision of bonuses, commissions or other payments.

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to describe the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 106:

All agreements between INTEL and any customer concerning the sale of MICROPROCESSORS (including without limitation all terms and conditions thereof and all "side letters").

RESPONSE TO REQUEST FOR PRODUCTION NO. 106:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 107:

All DOCUMENTS constituting or reflecting communications with any customer or potential customer concerning actual or proposed terms and conditions of the sale of MICROPROCESSORS, including without limitation pricing, quantities, and any FINANCIAL INDUCEMENTS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 107:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 108:

All DOCUMENTS constituting or reflecting internal discussions or other communications within INTEL concerning actual, contemplated or proposed terms and conditions of sale of MICROPROCESSORS, including without limitation pricing, quantities, and any FINANCIAL INDUCEMENT.

RESPONSE TO REQUEST FOR PRODUCTION NO. 108:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained

in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 109:

All DOCUMENTS constituting or reflecting communications with any OEM concerning its actual or potential loss or forfeiture of any FINANCIAL INDUCEMENTS from INTEL as a result of the actual or contemplated purchase of AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 109:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 110:

All DOCUMENTS constituting, reflecting, or pertaining to any consideration within INTEL of withdrawing, withholding or limiting any FINANCIAL INDUCEMENTS as a result of a customer's actual or contemplated purchase of AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 110:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a

diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 111:

All DOCUMENTS constituting or reflecting communications with any customer concerning its actual or potential loss of "Tier One" or other preferred INTEL customer status as a result of the actual or contemplated purchase of AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 111:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 112:

All DOCUMENTS constituting, reflecting or pertaining to any consideration within INTEL of withdrawing or withholding "Tier One" or other preferred INTEL customer status as a result of an OEM's actual or contemplated purchase of AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 112:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order

governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 113:

All databases reflecting INTEL's MICROPROCESSOR sales since January 1, 1999 on a customer by customer, product by product, and invoice by invoice basis.

RESPONSE TO REQUEST FOR PRODUCTION NO. 113:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for "[a]ll databases" is overly broad and unduly burdensome.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will meet and confer with AMD and produce non-privileged, responsive databases sufficient to show the requested information, to the extent such databases exist. Intel does not intend to produce every database within its possession, custody or control that may contain the requested information.

REQUEST FOR PRODUCTION NO. 114:

Databases and other DOCUMENTS sufficient to show invoice or purchase order data for MICROPROCESSORS and CHIPSETS sold to any customer worldwide from January 1, 1999 to the present, including at least the following fields: Invoice or purchase order number; date; "sold to" customer name and address; "ship to" customer name and address; product number, name and description; quantity of units; billings; unit price; any discounts, rebates, or other pricing adjustments.

RESPONSE TO REQUEST FOR PRODUCTION NO. 114:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 115:

Databases and other DOCUMENTS sufficient to show contra revenue associated with direct and resale billings for MICROPROCESSORS and CHIPSETS sold to any customer worldwide from January 1, 1999 to the present, including at least the following fields: date; associated invoice or purchase order number; “sold to” customer name and address; “ship to” customer name and address; associated product number, name and description; type and description of contra revenue applied (e.g., rebates, discounts, etc.); value of contra revenue applied.

RESPONSE TO REQUEST FOR PRODUCTION NO. 115:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 116:

Databases and other DOCUMENTS sufficient to show all forms of FINANCIAL INDUCEMENT provided, credited or applied by INTEL in connection with the worldwide sale or distribution of MICROPROCESSORS, CHIPSETS or COMPUTER SYSTEMS from January 1, 1999 to the present, including at least the following fields: date; recipient name,

address, and type of entity (i.e., OEM, RETAILER, DISTRIBUTOR, etc.); associated product number, name and, description; associated contract number, invoice number, or purchase order number (where available); type of FINANCIAL INDUCEMENT and description; value of FINANCIAL INDUCEMENT provided, credited or applied.

RESPONSE TO REQUEST FOR PRODUCTION NO. 116:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 117:

Databases and other DOCUMENTS sufficient to show all NON-FINANCIAL INDUCEMENTS provided, credited or applied by INTEL in connection with the worldwide sale or distribution of MICROPROCESSORS, CHIPSETS or COMPUTER SYSTEMS from January 1, 1999 to the present, including at least the following fields: date; recipient name, address, and type of entity (i.e., OEM, RETAILER, DISTRIBUTOR, etc.); associated product number, name and description; associated contract number, invoice number, or purchase order number (where available); description or type of NON-FINANCIAL INDUCEMENT; value of NON-FINANCIAL INDUCEMENT provided, credited or applied.

RESPONSE TO REQUEST FOR PRODUCTION NO. 117:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 118:

Databases and other DOCUMENTS sufficient to show and/or permit computation of INTEL's MICROPROCESSOR and CHIPSET manufacturing costs (fixed, variable and incremental), manufacturing margins, COGS, and gross margins on a facility-by-facility, product-by-product and quarter-by-quarter basis.

RESPONSE TO REQUEST FOR PRODUCTION NO. 118:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 119:

Databases and other DOCUMENTS sufficient to show and/or permit computation of INTEL's research and development costs, other overhead costs, and operating profit margins applicable to MICROPROCESSORS and CHIPSETS, on a product-by-product (where possible) and quarter-by-quarter basis.

RESPONSE TO REQUEST FOR PRODUCTION NO. 119:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 120:

DOCUMENTS sufficient to show YOUR research and development activities relating to MICROPROCESSORS, including, but not limited to: research and development plans; ongoing

research and development projects; proposed and actual budgets and schedules; and past, current or planned development, upgrade, modification, or discontinuance of any such plans or projects.

RESPONSE TO REQUEST FOR PRODUCTION NO. 120:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 121:

For the period January 1, 1997 to the present, all DOCUMENTS that relate to decisions by YOU to invest or expand, or not to invest in, or not to expand, YOUR research and development activities, including, but not limited to, any decisions to increase or not to increase the number of design teams that design MICROPROCESSORS for YOU or the number of engineers engaged in the design of YOUR MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 121:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 122:

All DOCUMENTS that relate to YOUR analysis of the amount of MICROPROCESSOR sales (whether by revenue or units) or share of MICROPROCESSOR sales necessary to support efficient research and development activities or efficient MICROPROCESSOR manufacturing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 122:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 123:

All DOCUMENTS that relate to YOUR decision to acquire or not to acquire MICROPROCESSOR design teams from other companies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 123:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 124:

Databases and other DOCUMENTS sufficient to show and/or permit computation of INTEL's investments and expenses for engineering support provided to OEMs, RETAILERS, system builders or value added resellers related to INTEL MICROPROCESSORS and CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 124:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 125:

Databases and other DOCUMENTS sufficient to show and/or permit computation of INTEL's planned and realized MICROPROCESSOR and CHIPSET production capacities, outputs and yields on a facility-by-facility, product-by-product and quarter-by-quarter basis, including at least the following information: calendar quarter; facility; wafer size and process technology; product number, name and description; planned and realized production capacity; planned and realized output; planned and realized defect densities; planned and realized cycle times; and planned and realized sort yields.

RESPONSE TO REQUEST FOR PRODUCTION NO. 125:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 126:

Databases and other DOCUMENTS sufficient to show and/or permit computation of INTEL's historical forecasts (since January 1, 1999) of MICROPROCESSOR and CHIPSET unit sales, revenue and unit prices on a product-by-product, customer-by-customer and quarter-by-quarter basis.

RESPONSE TO REQUEST FOR PRODUCTION NO. 126:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents or databases sufficient to show the requested information, to the extent such documents or databases exist.

REQUEST FOR PRODUCTION NO. 127:

All databases reflecting INTEL's CHIPSET sales on a customer by customer basis.

RESPONSE TO REQUEST FOR PRODUCTION NO. 127:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for "[a]ll databases" is overly broad and unduly burdensome. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will meet and confer with AMD and produce non-privileged, responsive databases sufficient to show the requested information, to the extent such databases exist. Intel does not intend to produce every database within its possession, custody or control that may contain the requested information.

REQUEST FOR PRODUCTION NO. 128:

DOCUMENTS sufficient to show, on a customer by customer and month by month basis, INTEL's sales of MICROPROCESSORS, including model or type, quantities, prices, and

discounts or other FINANCIAL INDUCEMENTS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 128:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 129:

DOCUMENTS sufficient to show, on a customer by customer and month by month basis, INTEL's sales of CHIPSETS, including model or type, quantities, prices, and discounts or other FINANCIAL INDUCEMENTS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 129:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 130:

All databases containing, recording or memorializing INTEL price information regarding sales of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 130:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for "[a]ll databases" is overly broad and unduly burdensome.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will meet and confer with AMD and produce non-privileged, responsive databases sufficient to show the requested information, to the extent such databases exist Intel does not intend to produce every database within its possession, custody or control that may contain the requested information.

REQUEST FOR PRODUCTION NO. 131:

All databases reflecting, or recording INTEL FINANCIAL INDUCEMENTS relating to MICROPROCESSORS or CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 131:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for “[a]ll databases” is overly broad and unduly burdensome.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will meet and confer with AMD and produce non-privileged, responsive databases sufficient to show the requested information, to the extent such databases exist. Intel does not intend to produce every database within its possession, custody or control that may contain the requested information.

REQUEST FOR PRODUCTION NO. 132:

All databases reflecting or recording the allocation of any advertising support, market development funds, or Intel Inside funds provided by INTEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 132:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for “[a]ll databases” is overly broad and unduly burdensome.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will meet and confer with AMD and produce non-privileged, responsive databases sufficient to show the requested information, to the extent such databases exist. Intel does not intend to produce every database within its possession, custody or control that may contain the requested information.

REQUEST FOR PRODUCTION NO. 133:

All DOCUMENTS relating to the practice, or alleged practice, by AMD of incorrectly invoicing or changing invoices to reflect higher sales amounts as a means of boosting sales or sales performance, including all DOCUMENTS relating to any rebates, co-op dollars, market development funds, advertising allowances or other payments that YOU provided, or considered providing, to any customer in connection with any sales that were so invoiced.

RESPONSE TO REQUEST FOR PRODUCTION NO. 133:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 134:

All DOCUMENTS discussing, analyzing or referring to any company's investment, partnership or joint venture with AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 134:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 135:

All DOCUMENTS constituting, reflecting, or pertaining to any investigation by INTEL, or by anyone acting on INTEL's behalf, of AMD, any AMD personnel, or any AMD product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 135:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 136:

All DOCUMENTS discussing, analyzing or referring to AMD's sales of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 136:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 137:

All DOCUMENTS discussing an INTEL customer or partner's purchase, use, endorsement or support of AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 137:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 138:

All studies, analyses, presentations or investigations concerning the quality, features, price, technical characteristics, performance, competitive significance, customer appeal, or other attributes of any AMD MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 138:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 139:

All DOCUMENTS discussing AMD's MICROPROCESSORS, including but not limited to any Sempron, Atlilon, Turion, or Opteron MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 139:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 140:

All studies, analyses, presentations or investigations concerning the quality, features, price, technical characteristics, performance, competitive significance, customer appeal, or other attributes of any CHIPSET developed, manufactured or offered for sale by any INTEL

competitor.

RESPONSE TO REQUEST FOR PRODUCTION NO. 140:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 141:

All DOCUMENTS constituting, reflecting, or pertaining to any competitive analyses, reverse engineering, technical evaluations or product performance assessments by INTEL of any AMD MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 141:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 142:

All DOCUMENTS constituting, reflecting or pertaining to any comparisons of any aspect of any INTEL and AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 142:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 143:

All studies, analyses, presentations or investigations concerning the efficiency, profitability, viability, capitalization, manufacturing capacity or skill, reputation, customer acceptance, financial condition or competitiveness of AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 143:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 144:

All studies, analyses, presentations or investigations concerning the efficiency, profitability, viability, capitalization, manufacturing capacity or skill, reputation, customer acceptance, financial condition or competitiveness of any rival developer, manufacturer or supplier of CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 144:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 145:

All DOCUMENTS constituting or reflecting any communications with, or interviews of, any third party (including any former AMD employee) regarding AMD or any AMD product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 145:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 146:

All DOCUMENTS constituting, reflecting or pertaining to INTEL's development, evaluation, or selection of technical or performance benchmarks for comparison of INTEL MICROPROCESSORS with other competing MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 146:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 147:

All studies, analyses, presentations or investigations concerning the potential for new competition against INTEL's MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 147:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 148:

All studies, analyses, presentations or investigations concerning the existence or significance of financial, technical, legal, regulatory, market or other bathers facing potential new developers or manufacturers of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 148:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 149:

All studies, analyses, presentations or investigations concerning any OEM's market share or position with respect to COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 149:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 150:

All studies, analyses, presentations or investigations concerning any OEM's actual or forecast sales of COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 150:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 151:

All studies, analyses, presentations or investigations concerning any OEM's actual or forecast requirements for MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 151:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 152:

All DOCUMENTS constituting, discussing or referring to INTEL's MICROPROCESSOR roadmaps.

RESPONSE TO REQUEST FOR PRODUCTION NO. 152:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 153:

All DOCUMENTS discussing or referring to the launch, promotion, advertisement or support of an AMD product or of a product containing an AMD MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 153:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 154:

All studies, analyses, presentations or investigations concerning any RETAILER's actual or forecast sales of COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 154:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 155:

All studies, analyses, presentations or investigations concerning any RETAILER's actual or forecast requirements for COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 155:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 156:

All DOCUMENTS constituting, reflecting or pertaining to any analyses or evaluations of AMD's patents.

RESPONSE TO REQUEST FOR PRODUCTION NO. 156:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Based upon the parties' meet and confer, Intel understands that this Request is limited to documents generated by a competitive analysis group that analyze AMD's patents from a technological, not legal perspective.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, and Intel's understanding of this request based upon the parties' meet and confer, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 157:

All DOCUMENTS discussing or referring to Microsoft's release of any 64-bit operating system.

RESPONSE TO REQUEST FOR PRODUCTION NO. 157:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a

diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 158:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for marketing or market studies with respect to INTEL's MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 158:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 159:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for business planning or development of business plans with respect to INTEL's MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 159:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 160:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for competitive analysis with regard to AMD or other rival MICROPROCESSOR suppliers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 160:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 161:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for MICROPROCESSOR pricing, including but not limited to responsibility for any decisions regarding any FINANCIAL INDUCEMENTS to INTEL customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 161:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 162:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for MICROPROCESSOR sales, including without limitation internal departments, teams or organizations with responsibility for any

specific OEM, ODM, RETAILER, and DISTRIBUTOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 162:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 163:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for MICROPROCESSOR marketing, including without limitation internal departments, teams or organizations with responsibility for any specific OEM, ODM, RETAILER, and DISTRIBUTOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 163:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 164:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for competitive analysis with regard to CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 164:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation

Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 165:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for strategic planning with respect to INTEL's MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 165:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 166:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for pricing studies with respect to INTEL's MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 166:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 167:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for the Intel Inside program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 167:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 168:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for attending or participating in any industry standard setting organizations or technology alliances with respect to MICROPROCESSORS or CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 168:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 169:

Organizational charts sufficient to identify (by name and job title) all INTEL personnel with responsibility, at any time since January 1, 2000, for developing, maintaining, or managing any aspect of INTEL's business relationship with Microsoft.

RESPONSE TO REQUEST FOR PRODUCTION NO. 169:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to identify the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 170:

All DOCUMENTS discussing or referring to any delays in the release of any INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 170:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 171:

All DOCUMENTS discussing or referring to any manufacturing, process, design and/or technological problems with any INTEL MICROPROCESSOR product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 171:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order

governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 172:

All DOCUMENTS discussing, referring to or prepared in connection with the recall of an INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 172:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in Full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 173:

All DOCUMENTS constituting, discussing or referring to customer complaints to INTEL by an OEM, RETAILER, DISTRIBUTOR or ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 173:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a

diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 174:

All DOCUMENTS constituting, discussing or referring to any responses or proposed responses to any customer complaints to INTEL by an OEM, RETAILER, DISTRIBUTOR or ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 174:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 175:

All DOCUMENTS constituting, reflecting or pertaining to any contracts, licenses, or agreements between INTEL and any third party that place any limitations, prohibitions, or restrictions on that third party's ability to design, develop, implement, license or promote technology for use with AMD MICROPROCESSORS or CHIPSETS or to conduct business that relates in any way to AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 175:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 176:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or promotes any standard, specification, or technology in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 176:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 177:

All DOCUMENTS referring, relating or pertaining to AMD's access to, or limitations, restrictions, or delays in AMD's access to, information, specifications, or standards developed in any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or promotes any standard, specification, or technology in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 177:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, information, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 178:

All DOCUMENTS referring, relating or pertaining to INTEL's strategies or reasons for participating in any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or promotes any standard, specification, or technology relating to MICROPROCESSORS or CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 178:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably

calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 179:

All DOCUMENTS referring, relating, or pertaining to INTEL's participation in any industry standard setting organization, formal or informal technology alliance, joint development partnership, or other group or entity that designs, develops, implements, discusses, sponsors, or promotes any standard, specification, or technology relating to MICROPROCESSORS or CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 179:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding

Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 180:

All DOCUMENTS referring, relating or pertaining to INTEL's formation of, or efforts to form, any organization, entity, partnership, alliance, or relationship with others to develop a standard or specification for any generation of DDR SDRAM (e.g., DDR SDRAM, DDR2 SDRAM, DDR3 SDRAM and DDR4 SDRAM) memory devices, controllers, interfaces, or other related memory standard or specification.

RESPONSE TO REQUEST FOR PRODUCTION NO. 180:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 181:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from any organization, entity, partnership, alliance, or other relationship involving

INTEL to develop a standard or specification for any generation of the DDR SDRAM (e.g., DDR SDRAM, DDR2 SDRAM, DDR3 SDRAM and DDR4 SDRAM) memory devices, controllers, interfaces, or other related memory standard or specification including, but not limited to, the Advanced DRAM Technology (ADT) Consortium and any partnerships or alliances relating to post-DDR3 SDRAM technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 181:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 182:

All DOCUMENTS constituting, reflecting or pertaining to any memory module pin definition proposals, presentations, speeches, speaker's notes, or handouts by INTEL relating to any generation of DDR SDRAM devices (e.g., DDR SDRAM, DDR2 SDRAM, DDR3 SDRAM and DDR4 SDRAM), and any drafts, revisions, or versions thereof.

RESPONSE TO REQUEST FOR PRODUCTION NO. 182:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 183:

All DOCUMENTS constituting, reflecting or pertaining to any specifications or standards, or any proposals, drafts, revisions, or versions thereof, relating to Secure 110, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in COMPUTER SYSTEMS including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PC1 SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 183:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective

order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 184:

All DOCUMENTS constituting, reflecting or pertaining to any technical overviews, presentations, tutorials, white papers, marketing documents or other general descriptions of any specifications or standards relating to Secure I/O, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in COMPUTER SYSTEMS including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PC1 SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 184:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things

contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 185:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from the design, development, implementation, licensing or promotion of any specification, standard, protocol, or technology relating to Secure I/O, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in COMPUTER SYSTEMS including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PC1 SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 185:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 186:

All DOCUMENTS referring, relating or pertaining to INTEL's decision to partner with any third party regarding the design, development, implementation, licensing or promotion of

any standards, specifications, protocols or technology relating to Secure FO, LaGrande Technology (LT), Palladium, Next Generation Secure Computing Base (NGSCB), Trusted Platform Module (TPM), Trusted Network Connect (TNC), Network Access Protection (NAP), or any other initiative relating to the security of input or output interfaces in COMPUTER SYSTEMS including, but not limited to, those initiatives sponsored by the Trusted Computing Platform Alliance, Trusted Computing Group, PCI SIG, USB Implementers Forum, IEEE, or any successor entities or organizations, or informal alliances in which INTEL has participated.

RESPONSE TO REQUEST FOR PRODUCTION NO. 186:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 187:

All DOCUMENTS constituting, reflecting or pertaining to any specifications or standards, or any proposals, drafts, revisions, or versions thereof, relating to the Advanced Server Management Interface, Active Management Technology (iAMT), Virtualization Technology (VT), I/O Acceleration Technology (POAT), PC1 Express, Serial Digital Video Output (SDVO),

802.11n, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 187:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 188:

All DOCUMENTS constituting, reflecting or pertaining to any technical overviews, presentations, tutorials, white papers, marketing documents or other general descriptions concerning the Advanced Server Management Interface, Active Management Technology (iAMT), Virtualization Technology (VT), I/O Acceleration Technology (I/OAT), PC1 Express, Serial Digital Video Output (SDVO), 802.11n, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 188:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full, Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 189:

All DOCUMENTS referring, relating or pertaining to AMD's participation in or exclusion from the design, development, implementation, licensing or promotion of any specification, standard, or protocol relating the Advanced Server Management Interface, Active Management Technology (iAMT), Virtualization Technology (VT), I/O Acceleration Technology (I/OAT), PC1 Express, Serial Digital Video Output (SDVO), 802.111n, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 189:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation

Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 190:

All DOCUMENTS referring, relating or pertaining to INTEL's decision to partner with any third party regarding the design, development, implementation, licensing or promotion of any standards, specifications, protocols or technology relating to the Advanced Server Management Interface, Active Management Technology (IAMT), Virtualization Technology (VT), I/O Acceleration Technology (I/OAT), PCI Express, Serial Digital Video Output (SDVO), 802.1 In, East Fork, Digital Home, VIIV, any software product involving VM Ware, any battery or power management technology involving Matsushita or Panasonic, or any related or competing technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 190:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things

contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 191:

All DOCUMENTS constituting, reflecting, or pertaining to any complaints by third parties, or INTEL's response to such complaints, regarding any INTEL compiler.

RESPONSE TO REQUEST FOR PRODUCTION NO. 191:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 192:

All DOCUMENTS referring, relating or pertaining to INTEL's design, development or implementation of CPUID or any other software feature in any INTEL compiler that detects the identity of the MICROPROCESSOR in a COMPUTER SYSTEM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 192:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 193:

All DOCUMENTS referring, relating or pertaining to any features or functionality of INTEL's compilers that are not enabled, activated, or used, or, conversely, are only enabled, activated, or used, when the software is operated on a COMPUTER SYSTEM with a non-INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 193:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 194:

All DOCUMENTS referring, relating, or pertaining to the comparative performance of software compiled by any INTEL compiler when operated on COMPUTER SYSTEMS with INTEL vs. non-INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 194:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 195:

All DOCUMENTS referring, relating, or pertaining to any patches, modifications, or other changes to any INTEL compiler to alter or improve the performance of software compiled by that INTEL compiler when operated on a COMPUTER SYSTEM with a non-INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 195:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document by such Custodians on any shared Production Protocol, including files maintained server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 196:

All DOCUMENTS referring, relating or pertaining to any third party's incorporation, implementation, support, use or promotion of AMD's 64-bit instruction set in any software product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 196:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation

Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 197:

All DOCUMENTS referring, relating or pertaining to the timing of any third party's design, development, promotion or release of any software product that incorporates, implements, supports or uses AMD's 64-bit instruction set.

RESPONSE TO REQUEST FOR PRODUCTION NO. 197:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 198:

All DOCUMENTS constituting, reflecting or pertaining to any studies, analyses, reports, memoranda, investigations, submissions, proposals, bids, presentations or communications regarding the use of INTEL or AMD MICROPROCESSORS in Microsoft's X-Box game console.

RESPONSE TO REQUEST FOR PRODUCTION NO. 198:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects on the grounds that the Request is overly broad and seeks information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. In this regard, Intel objects to the Request to the extent it seeks Intel's engineering documents and/or software codes, which will not be produced in response to this Request.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 199:

All DOCUMENTS referring, relating or pertaining to any AMD submission, proposal, bid, presentation or communication relating to the use of AMD MICROPROCESSORS in Microsoft's X-Box game console.

RESPONSE TO REQUEST FOR PRODUCTION NO. 199:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in Full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information. Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 200:

All non-disclosure agreements between INTEL and any INTEL MICROPROCESSOR customer or INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 200:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 201:

All pleadings, correspondence, discovery requests and responses, briefs, affidavits and declarations, orders, deposition transcripts, hearing transcripts, documents produced by INTEL, and settlement agreements in the litigation entitled Intergraph Corporation v. Intel Corporation, Case No. CV 97-N-3023-NE, U.S. District Court, Northern District of Alabama, Northeastern Division, filed on or about November 17, 1997.

RESPONSE TO REQUEST FOR PRODUCTION NO. 201:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is overly broad and unduly burdensome. Intel also objects to this Request on the grounds that it calls for

information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce all documents from the *Intergraph* litigation that (i) either were produced by Intel or contain Intel information (such as depositions of Intel witnesses); and (ii) are relevant to the subject matter of this action. Intel does not intend to produce documents that relate to the patent and other non-antitrust allegations in the *Intergraph* action.

REQUEST FOR PRODUCTION NO. 202:

All pleadings, correspondence, discovery requests and responses, briefs, affidavits and declarations, orders, deposition transcripts, hearing transcripts, documents produced by INTEL, and settlement agreements in the litigation entitled Intergraph Hardware Technologies Company v. Dell, Hewlett-Packard, and Gateway, Eastern District of Texas, Marshall Division, Civil Action No. 2-02CV312 (TJW).

RESPONSE TO REQUEST FOR PRODUCTION NO. 202:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this request on the grounds that it is overly broad and unduly burdensome. Intel also objection to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce all documents from the *Intergraph* litigation that (i) either were produced by Intel or contain Intel information (such as depositions of Intel witnesses); and (ii) are relevant to the subject matter of this action Intel does not intend to produce documents that relate to the patent

and other non-antitrust allegations in the *Intergraph* action.

REQUEST FOR PRODUCTION NO. 203:

All DOCUMENTS constituting, referring, relating or pertaining to any agreement or other arrangement pursuant to which INTEL paid consideration to or on behalf of Dell in connection with the settlement of patent infringement litigation brought against Dell by Intergraph Corporation.

RESPONSE TO REQUEST FOR PRODUCTION NO. 203:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 204:

DOCUMENTS sufficient to fully describe INTEL's document retention policies in effect at any time since January 1, 2000.

RESPONSE TO REQUEST FOR PRODUCTION NO. 204:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will produce non-privileged documents sufficient to describe the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 205:

All DOCUMENTS evidencing, reflecting or pertaining to INTEL's destruction of DOCUMENTS pursuant to or in violation of INTEL's document retention policies and procedures.

RESPONSE TO REQUEST FOR PRODUCTION NO. 205:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this request on the grounds that it is unduly burdensome and calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel also objects to this request on the grounds that it is argumentative, harassing, and lacks foundation. Based on the parties' meet and confer, Intel understands that this Request is limited to any instances in which violations of Intel's document retention policy were reported internally via the appropriate channels.

Subject to its General Objections, its Specific Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, and Intel's understanding of this Request based upon the parties' meet and confer, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 206:

All DOCUMENTS constituting or reflecting communications with or among third parties concerning this litigation, the allegations in the Complaint, or any alleged improper or exclusionary conduct by INTEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 206:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 207:

All DOCUMENTS upon which INTEL relies to support any of the denials, allegations, or statements in INTEL's Answer to the Complaint in *Advanced Micro Devices, Inc. et al v. Intel Corp., et al*, No. 05-441 DE (D. Del.).

RESPONSE TO REQUEST FOR PRODUCTION NO. 207:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 208:

All DOCUMENTS upon which INTEL relies to support any of its affirmative defenses in its Answer to the Complaint in *Advanced Micro Devices, Inc. et al v. Intel Corp., et al*, No. 05-

441 JJF (D. Del.).

RESPONSE TO REQUEST FOR PRODUCTION NO. 208:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 209:

All DOCUMENTS, data compilations, and tangible things that are in the possession, custody, or control of INTEL, that INTEL may use to support its claims or defenses.

RESPONSE TO REQUEST FOR PRODUCTION NO. 209:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 210:

All DOCUMENTS that relate to YOUR actions to manage inventories, including, but not limited to, the impact of such actions on YOUR MICROPROCESSOR manufacturing or sales,

financial performance, and profitability.

RESPONSE TO REQUEST FOR PRODUCTION NO. 210:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 211:

All DOCUMENTS that relate to any steps that YOU took to align inventories or eliminate obsolete product from YOUR inventories, YOUR customer's inventories, or YOUR supply chain, including, but not limited to, the impact of such actions on YOUR MICROPROCESSOR manufacturing, sales, financial performance, or profitability.

RESPONSE TO REQUEST FOR PRODUCTION NO. 211:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 212:

All DOCUMENTS that relate to the impact on YOUR MICROPROCESSOR sales, financial performance, and profitability from transitioning to a new or different semiconductor manufacturing technology node (the nanometer dimension of the MICROPROCESSOR feature size).

RESPONSE TO REQUEST FOR PRODUCTION NO. 212:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 213:

All DOCUMENTS that relate to YOUR ability or inability to satisfy customer demands for MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 213:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-

electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 214:

All DOCUMENTS relating to complaints about problems with or deficiencies in YOUR sales force.

RESPONSE TO REQUEST FOR PRODUCTION NO. 214:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 215:

All DOCUMENTS relating to the projected or planned introduction date by INTEL of any product competing in a MICROPROCESSOR market.

RESPONSE TO REQUEST FOR PRODUCTION NO. 215:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 216:

All DOCUMENTS that relate to the decision to end the life of any MICROPROCESSOR product, including the decision to reduce price as the MICROPROCESSOR product was phased out.

RESPONSE TO REQUEST FOR PRODUCTION NO. 216:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 217:

All DOCUMENTS provided by INTEL to, or seized from INTEL by, any U.S., state, or foreign governmental competition authority relating to INTEL, AMD, or competition in the MICROPROCESSOR industry, excluding briefs, white papers or other submissions prepared for purposes of communication with any such competition authority.

RESPONSE TO REQUEST FOR PRODUCTION NO. 217:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and

(ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian

REQUEST FOR PRODUCTION NO. 218:

All DOCUMENTS prepared for or in connection with a QBR (quarterly business review) with any INTEL MICROPROCESSOR customer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 218:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian..

REQUEST FOR PRODUCTION NO. 219:

For the period January 1, 1997 to the present, all DOCUMENTS that relate to any actual or contemplated joint venture, partnership, or alliance by INTEL with any third party to develop MICROPROCESSOR manufacturing technologies or to manufacture MICROPROCESSORS or CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 219:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination; use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document

Production Protocol, including files maintained by such Custodians on any shared server, and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 220:

For the period January 1, 1997 to the present, all DOCUMENTS that relate to any actual or contemplated contract manufacturing arrangement whereby a third party is to manufacture MICROPROCESSORS or CHIPSETS for YOU or on YOUR behalf.

RESPONSE TO REQUEST FOR PRODUCTION NO. 220:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination; use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server, and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 221:

All DOCUMENTS that relate to the impact of capacity constraints or limitations on YOUR MICROPROCESSOR sales, financial performance, or profitability.

RESPONSE TO REQUEST FOR PRODUCTION NO. 221:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination; use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document

Production Protocol, including files maintained by such Custodians on any shared server, and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 222:

All DOCUMENTS that relate to any plans or potential plans by YOU to use third parties to manufacture CHIPSETS for YOU or on YOUR behalf.

RESPONSE TO REQUEST FOR PRODUCTION NO. 222:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Based upon Intel's General Objections and these specific objections, Intel does not intend to produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 223:

All DOCUMENTS that relate to YOUR offers of any INTEL product for sale on the condition that the prospective customer purchase another INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 223:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 224:

All DOCUMENTS that discuss AMD's CSIP program, including but not limited to any

DOCUMENTS that relate to any comparison, analysis, assessment, or evaluation of AMD's CSIP program and INTEL's SIPP program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 224:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 225:

All DOCUMENTS that constitute or relate to: (a) applications or requests by INTEL, or anyone acting on behalf of INTEL, to any governmental entity to ban or restrict the specification of MICROPROCESSOR brands or MICROPROCESSOR clock frequencies in the procurement of any type of COMPUTER SYSTEM; or (b) specifications or requirements by any governmental entity that a particular brand of MICROPROCESSORS must be used in any type of COMPUTER SYSTEM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 225:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii)

all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 226:

All DOCUMENTS that relate to the ability or inability of any customer to obtain price concessions or reductions, or to extract anything else of value from suppliers of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 226:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and ambiguous.

Subject to its General Objections, these specific objections, and the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 227:

All DOCUMENTS concerning or relating to prices for MICROPROCESSORS that would or might prevail in the event of actual or projected increased market share by AMD or any other actual or potential competitor.

RESPONSE TO REQUEST FOR PRODUCTION NO. 227:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a

diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian

REQUEST FOR PRODUCTION NO. 228:

All DOCUMENTS concerning or relating to any strategies considered by INTEL to maintain or increase its market share for MICROPROCESSORS or to meet competition from AMD or any other actual or potential competitor.

RESPONSE TO REQUEST FOR PRODUCTION NO. 228:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is overly broad and unduly burdensome. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 229:

All DOCUMENTS concerning the decision by Dell Inc. announced in May of 2006 that Dell Inc. will soon be selling four-socket servers equipped with AMD Opteron MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 229:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 230:

All DOCUMENTS that relate to any effect this lawsuit or AMD's lawsuit against INTEL has had on INTEL's MICROPROCESSOR marketing practices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 230:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full, Intel also objects to this Request on the grounds that it is vague, ambiguous, and overly broad. Intel further objects to this Request on the grounds it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel also objects to this request to the extent that it seeks to discover mental impressions, conclusions, opinions, legal research, legal advice, and theories of Intel and its counsel, and thereby invades the attorney-client privilege and/or the attorney work product doctrine. Intel does not intend to produce any documents in response to this Request.

REQUEST FOR PRODUCTION NO. 231:

All DOCUMENTS relating to whether and the extent to which OEMs pass through to their customers the costs of COMPUTER SYSTEM components, including MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 231:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 232:

All DOCUMENTS relating to how DISTRIBUTORS and/or RETAILERS set their resale prices for COMPUTER SYSTEMS and/or MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 232:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it is vague and ambiguous, as retailers do not sell microprocessors.

Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian

REQUEST FOR PRODUCTION NO. 233:

All DOCUMENTS relating to how an increase in wholesale prices of

MICROPROCESSORS affects retail CHIPSET prices and/or retail prices for COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 233:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and ambiguous as to “retail chipset prices.” Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce documents relating to “retail chipset prices.”

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 234:

All DOCUMENTS relating to how retail prices for COMPUTER SYSTEMS and/or CHIPSETS are set by RETAILERS and/or OEMs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 234:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and ambiguous to the extent it is seeking information concerning retail prices for chipsets. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce documents relating to how retail prices for chipsets

are set by retailers and/or OEMs.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 235:

All DOCUMENTS relating to how wholesale prices for COMPUTER SYSTEMS and/or CHIPSETS are set by DISTRIBUTORS and/or OEMs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 235:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and ambiguous to the extent it is seeking information concerning wholesale prices for chipsets set by OEMs. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce documents relating to how wholesale prices for chipsets are set by distributors and/or OEMs.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other

non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 236:

All DOCUMENTS relating to comparisons of the retail and/or wholesale prices of INTEL' s, AMD's and Cyrix's respective CHIPSETS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 236:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Based upon Intel's General Objections and these specific objections, Intel does not intend to produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 237:

All demand elasticity studies involving CHIPSET retail and/or wholesale prices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 237:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Based upon Intel's General Objections and these specific objections, Intel does not intend to produce documents in response to this Request.

REQUEST FOR PRODUCTION NO. 238:

All DOCUMENTS concerning or relating to Skype, including, but not limited to, all DOCUMENTS relating to any business relationship between Skype and INTEL and between Skype and AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 238:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a

diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 239:

All DOCUMENTS that relate to any actual or contemplated joint venture, partnership, alliance or collaboration between YOU and any third party, including, but not limited to, Skype, to develop, distribute, advertise, promote, and/or market software that enhances or optimizes performance when used with COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 239:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 240:

All DOCUMENTS that relate to any FINANCIAL INDUCEMENT offered by YOU to any third party, including, but not limited to, Skype, to develop, distribute, advertise, promote, and/or market software that enhances and/or optimizes performance when used with COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 240:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and

overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 241:

All DOCUMENTS that relate to any FINANCIAL INDUCEMENT offered by YOU to any third party, including, but not limited to, Skype, related to any exclusive arrangement, agreement, or understanding to develop, distribute, advertise, promote, and/or market software to the exclusion of AMD and/or any other MICROPROCESSOR manufacturer, designer, or developer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 241:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and ambiguous, particularly as to the meaning of “exclusive arrangement” and “to the exclusion of AMD and/or any other microprocessor manufacturer, designer, or developer.” Intel also objects to this Request as overly broad. Intel further objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 242:

All DOCUMENTS constituting or reflecting analyses, summaries, report, studies or other writings pertaining to any FINANCIAL INDUCEMENT (including, but not limited to, MDF) offered by YOU to any third party, including, but not limited to, Skype, in connection with the development, distribution, advertising, promotion, and/or marketing of software that enhances or optimizes performance when used with COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 242:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full, Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 243:

All DOCUMENTS that relate to any NON- FINANCIAL INDUCEMENT or non-cash benefit, perquisite or other consideration offered by YOU to any third party, including, but not limited to, Skype, to develop, distribute, advertise, promote, and/or market software that enhances and/or optimizes performance when used with COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 243:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 244:

DOCUMENTS sufficient to show the aggregate amount by quarter of the FINANCIAL INDUCEMENTS provided by YOU to any third party, including, but not limited to, Skype, to develop, distribute, advertise, promote, and/or market software that enhances and/or optimizes performance when used with COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 244:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 245:

All DOCUMENTS that constitute or relate to consumer or customer feedback regarding the development, distribution, advertisement, promotion, and/or marketing of software that enhances and/or optimizes performance when used with COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 245:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 246:

All DOCUMENTS that constitute or relate to the software programming that results in enhanced or optimized performance when software developed, distributed, advertised, promoted, and/or marketed by any third party, including, but not limited to, Skype, is used with COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product.

RESPONSE TO REQUEST FOR PRODUCTION NO. 246:

Intel incorporates by reference and asserts each of its General Objections set forth above

as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad, Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 247:

All DOCUMENTS that relate to the technical feasibility of restricting performance enhancements to COMPUTER SYSTEMS containing INTEL MICROPROCESSORS or any other INTEL product in connection with running software developed, distributed, advertised, promoted, and/or marketed by any third party, including, but not limited to, Skype.

RESPONSE TO REQUEST FOR PRODUCTION NO. 247:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague, ambiguous, and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 248:

All DOCUMENTS that relate to the capability of Skype's technology, including, but not limited to, Skype 2.0 technology, for 10-person conference calls when running on INTEL MICROPROCESSORS and/or whether Skype's technology has the capability for 10-person conference calls when running using a MICROPROCESSOR manufactured by AMD or any other company than INTEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 248:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is

neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 249:

All DOCUMENTS that relate to steps taken to disable, hinder, impede, impair, or adversely affect the ability of any of Skype's technology, including, but not limited to, Skype 2.0 technology, to run using a MICROPROCESSOR manufactured by AMD or any other company other than INTEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 249:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other

non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 250:

All DOCUMENTS that constitute or relate to any agreement between Skype and INTEL to make Skype's technology work better and/or provide more capabilities (including, but not limited to, the capability of accommodating more parties on a conference call) when running on an INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 250:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 251:

All DOCUMENTS that relate to YOUR or Skype's use of any "Get CPU ID" operation, or any similar operation, in order to identify the type of processor running any of Skype's technology, including, but not limited to, Skype 2.0 technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 251:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated

to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 252:

All DOCUMENTS that constitute or relate to work performed by YOUR engineers to configure, program, or adapt Skype's software to accept INTEL MICROPROCESSORS as the default MICROPROCESSOR for the 10-person conference calling feature using Skype 2.0.

RESPONSE TO REQUEST FOR PRODUCTION NO. 252:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any programs, software, or source code in response to this Request.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other

non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 253:

All DOCUMENTS that relate to performance testing conducted by YOU or Skype in connection with the 10-person conference calling feature using Skype 2.0 technology.

RESPONSE TO REQUEST FOR PRODUCTION NO. 253:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad, Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 254:

All DOCUMENTS that relate to the duration of the limitation of the 10-person conference calling feature using Skype 2.0 technology to an INTEL MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 254:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objection, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 255:

All DOCUMENTS relating to any impact brand name specifications in government or other contracts for MICROPROCESSORS has on INTEL, MICROPROCESSOR prices, computer prices or competition.

RESPONSE TO REQUEST FOR PRODUCTION NO. 255:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 256:

All DOCUMENTS constituting, reflecting or pertaining to any studies, analyses, reports, memoranda, investigations, submissions, proposals, bids, presentations or communications regarding the use of INTEL or AMD MICROPROCESSORS in any device other than a

COMPUTER SYSTEM or Microsoft's X-Box game console.

RESPONSE TO REQUEST FOR PRODUCTION NO. 256:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad, Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 257:

All DOCUMENTS referring, relating or pertaining to any AMD submission, proposal, bid, presentation or communication relating to the use of AMD MICROPROCESSORS in any device other than a COMPUTER SYSTEM or Microsoft's X-Box game console.

RESPONSE TO REQUEST FOR PRODUCTION NO. 257:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 258:

All DOCUMENTS concerning any evaluation by INTEL of actual or potential savings to taxpayers if all procurement solicitations by the federal government for computer hardware no longer specified INTEL brand x86 MICROPROCESSORS or the equivalent of an INTEL brand x86 MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 258:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague, ambiguous, and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Intel does not intend to produce any documents in response to this Request as it is currently framed.

REQUEST FOR PRODUCTION NO. 259:

All DOCUMENTS reflecting any evaluation by INTEL of competition or market shares with respect to four-socket servers and/or reflecting INTEL's reaction to such competition or market share changes.

RESPONSE TO REQUEST FOR PRODUCTION NO. 259:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and overly broad. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, these specific objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding

Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 260:

All DOCUMENTS concerning sales by Sun Microsystems, Rackable Systems and HP/Compaq of COMPUTER SYSTEMS equipped with AMD MICROPROCESSORS and INTEL's reactions or responses to such sales.

RESPONSE TO REQUEST FOR PRODUCTION NO. 260:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that it is vague and ambiguous to the extent it is seeking information concerning prices for computer systems set by Sun Microsystems, Rackable Systems and HP/Compaq. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 261:

All DOCUMENTS relating to the presentation given by Jonathan Douglas at the Hot Chips conference held in June of 2005 concerning Intel's introduction of the dual-core Pentium 4 MICROPROCESSOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 261:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 262:

ALL DOCUMENTS relating to INTEL's announcement on October 24, 2005 that it was: (a) delaying the timetable for volume shipments of the Montecito CHIPSET and (b) canceling the introduction of a Xeon MICROPROCESSOR scheduled to be released in 2007.

RESPONSE TO REQUEST FOR PRODUCTION NO. 262:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 263:

All DOCUMENTS relating to the “[r]e-structuring, re-sizing [and] re-purposing” of INTEL mentioned in Paul Otellini’s presentation at the INTEL annual stockholders’ meeting of May 17, 2006, found at http://intel_asm.edgesuite.net/intel_asm2006.pdf.

RESPONSE TO REQUEST FOR PRODUCTION NO. 263:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things that relate or refer to Paul Otellini’s presentation at the Intel annual stockholders’ meeting of May 17, 2006 and that are contained in (i) the files of the designated Custodians as per the parties’ Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries’ corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 264:

All DOCUMENTS relating to the statement that INTEL is “[a]ldusting to the business realities of today/tomorrow” in Paul Otellini’s presentation at the INTEL annual stockholders’ meeting of May 17, 2006, found at http://intel_asm.edgesuite.net/intel_asm2006.pdf.

RESPONSE TO REQUEST FOR PRODUCTION NO. 264:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to its General Objections, the parties finalizing the Stipulation Regarding Document Production Protocol, and the entry of an appropriate protective order governing the dissemination, use, and disclosure of confidential information, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things that relate or refer to Paul Otellini's presentation at the Intel annual stockholders' meeting of May 17, 2006 and that are contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

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Dated: June 30, 2006

739370

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Intel Corporation*

CERTIFICATE OF SERVICE

I, W. Harding Drane, hereby certify that on June 30, 2006, true and correct copies of the within document were caused to be served on the attorney of record at the following addresses as indicated:

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EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE INTEL CORP. MICROPROCESSOR)	
ANTITRUST LITIGATION,)	MDL No. 05-1717-JJF
)	
<hr/>		
PHIL PAUL, on behalf of himself and all others)	
similarly situated,)	
)	C.A. No. 05-485-JJF
Plaintiffs,)	
)	CONSOLIDATED ACTION
v.)	
)	
INTEL CORPORATION,)	
)	
Defendant.)	
)	
)	

**DEFENDANT INTEL CORPORATION'S AMENDED RESPONSES
TO PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34, Federal Rules of Civil Procedure, defendant Intel Corporation ("Intel") hereby responds to Class Plaintiffs' First Request for Production of Documents.

GENERAL RESPONSE

1. Intel's responses herein are not intended to, nor do they, constitute a waiver of the following rights, and are in fact intended to preserve and do preserve the following:

a. the right to object to the admissibility of any document produced pursuant to these Requests on grounds of authenticity, foundation, relevance, materiality, privilege, or any other objection which may arise in subsequent proceedings in, or trial of, this or any other action;

b. the right to object to plaintiffs' use of any document produced pursuant to this set of Requests, including pursuant to the terms of the protective order that may be entered in this case, in any subsequent proceeding in, or trial of, this or any other action;

c. the right to object on any grounds at any time to any other discovery involving documents produced pursuant to this set of Requests; and

d. the right to amend this response in the event that any documents are unintentionally omitted from production. Inadvertent identification or production of privileged documents or information by Intel pursuant to these Requests does not constitute a waiver of any applicable privilege.

2. Nothing contained herein or provided in response to the Requests consists of, or should be construed as, an admission relating to the existence or nonexistence of any alleged facts or information referenced in any Request or that Intel is in agreement with plaintiffs' characterization of the facts in any such Request. By indicating that Intel will produce any responsive documents, Intel does not represent that such documents exist or are in its possession, custody, or control but only that it will conduct the searches indicated for the documents sought.

3. The parties have negotiated an agreement governing the scope of searches required to locate responsive documents, including appropriately limiting the custodians whose files would need to be searched for responsive documents ("Stipulation Regarding Document Production Protocol"). In response to certain Requests that are essentially corporate inquiries, Intel states that in addition to its corporate files it will search the files of the custodians identified in the Stipulation Regarding Document Production Protocol, as modified by Exhibit A. Intel notes, however, that these custodians were not identified for the purpose of responding to plaintiffs' corporate inquiries.

4. Consistent with its obligation under the Federal Rules of Civil Procedure, Intel will make reasonable efforts to respond to each Request, to the extent that no objection is made, as Intel understands and interprets the request. If plaintiffs subsequently assert an interpretation of any Request that differs from that of Intel's, Intel reserves the right to supplement its objections and responses and to produce and use additional documents.

5. Intel makes the following responses upon presently available information and without prejudice to Intel's right to utilize subsequently discovered facts or documents.

6. These Amended Responses presume that the Court's decision regarding lack of subject matter jurisdiction over foreign conduct challenged by AMD will be similarly applicable

to the foreign conduct challenged by the Class Plaintiffs in their Amended Consolidated Class Complaint.

GENERAL OBJECTIONS

1. Intel objects to each Request herein to the extent that it seeks documents or information protected from disclosure by the attorney-client privilege, work product doctrine, joint defense privilege, or any other applicable privilege.

2. Intel objects to plaintiffs' "Definitions," "Instructions," and "Documents to Be Produced" to the extent that they impose or attempt to impose obligations beyond those required by the Federal Rules of Civil Procedure and the Local Rules of the District of Delaware.

3. Intel objects to every Request herein to the extent that it seeks confidential, proprietary, trade secret, or competitively sensitive information. Intel will not produce any such documents except pursuant to the terms of the protective order entered in this action.

4. Intel objects to each Request herein to the extent that it is argumentative and/or calls upon Intel to interpret legal theories or to draw legal conclusions.

5. Intel objects to each Request herein to the extent that the documents requested already are in plaintiffs' possession or are available to plaintiffs from another source that is more convenient, less burdensome, or less expensive.

6. Intel objects to the definition of "INTEL," "YOU," and "YOUR" as imposing obligations on Intel beyond those authorized by the Federal Rules of Civil Procedure and as purporting to require Intel to produce documents that are not within its possession, custody, or control. In this regard, Intel objects to the definition of "INTEL", "YOU", and "YOUR" as including "all past and present officers, directors, agents, representatives, employees, consultants, attorneys, entities acting in joint venture or partnership relationships with defendants, and others acting on either of their behalf."

7. Intel objects to the definition of "AMD" as imposing obligations on Intel beyond those authorized by the Federal Rules of Civil Procedure. In this regard, Intel objects to the definition of "AMD" as including "all past and present officers, directors, agents,

representatives, employees, consultants, attorneys, entities acting in joint venture or partnership relationships with them, and others acting on either of their behalf.”

8. Intel objects to the definition of “INTEL PARTNER” as vague, ambiguous, overbroad and not subject to reasonable interpretation as it seeks to include “any company that designs, develops, manufactures, or sells any hardware, software, or any other product that is compatible for use with, or support of, any INTEL or AMD MICROPROCESSOR in a COMPUTER SYSTEM.” Intel’s response to any Request concerning an “INTEL PARTNER” will be limited to those companies that design, develop, manufacture, or sell Intel microprocessors and/or chipsets.

9. Intel objects to each Request herein that demands the production of “all databases” as overly broad and unduly burdensome. Intel will meet and confer with plaintiffs concerning the scope of these Requests and will produce a database or databases “sufficient to show” the requested information, to the extent such databases exist. Intel does not intend to produce “all” databases within its possession, custody or control that may contain the requested information.

10. Intel objects to Instructions 4-10 to the extent that they purport to impose on Intel obligations that go beyond those authorized by the Federal Rules of Civil Procedure or that are unduly burdensome. In this regard, Intel objects to plaintiffs’ demand that all documents maintained or stored electronically be produced in “native electronic format with all relevant metadata intact.”

11. Each and all of the foregoing General Objections are hereby expressly incorporated into each and all of the following specific responses. For particular emphasis, one or more of these General Objections may be reiterated in a specific response. The absence of any reiteration in a given specific response is neither intended as, nor shall be construed as, a limitation or waiver of any General Objection made herein. Moreover, the inclusion of a specific objection to a specific response is neither intended as, nor shall be construed as, a limitation or waiver of a General Objection or any other specific objection.

**OBJECTION BASED ON THE COURT'S SEPTEMBER 27, 2006
RULING ON SUBJECT MATTER JURISDICTION AND STANDING**

Intel objects to each Request herein to the extent that it seeks the production of information relating to AMD's claims based on alleged lost sales of AMD's microprocessors to foreign customers and the allegations in the Complaint forming the basis for those claims, namely paragraphs 40-44, 54-57, 74-75, 81, 83, 86, 89, 93-94, 100-101 and 106. The basis for this objection is the analysis set out in the Court's September 26, 2006, Order holding that it lacks subject matter jurisdiction over such conduct and that AMD lacks standing to pursue these allegations. Intel will not produce documents responsive to AMD's requests that evidence or constitute Intel's conduct in foreign commerce, including, but not limited to, negotiation of individual sales or contracts in foreign commerce with the customers referenced in allegations specifically stricken by the Court and similarly situated companies not referenced in the Complaint.

AMD has taken the position that the Court's Order dismissing AMD's claims based on alleged lost sales of AMD's microprocessors to foreign customers and striking the related allegations changes *nothing* with regard to the scope of discovery. Intel's position is that the Order, by striking the allegations of foreign conduct, significantly narrows the scope of discovery and that considerable discovery sought by AMD is now not relevant to the subject matter of this case and not reasonably calculated to lead to the discovery of admissible evidence. Nonetheless, Intel proposes to provide significant discovery relating to the microprocessor market and sales to customers outside the United States. In making this proposal, Intel does not concede the relevance or admissibility of the information for purposes of trial or discovery. Intel will therefore produce responsive non-privileged documents that refer or relate to market share analyses, sales and demand forecasts, competitive analyses strategic plans (and similar documents), as well as documents sufficient to show (i) the prices charged by Intel to foreign customers, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price, and (ii) market development funds, Intel Inside funds, or any other

financial consideration from Intel to foreign customers. Intel has in response to specific document requests set out where the objection based on the Court's Ruling applies and where documents covered by this objection will not be produced, as well as the remaining categories of documents that will be produced.

In addition, pursuant to the parties' document production stipulation, the parties have agreed to a custodial approach to production on certain requests. Under this stipulation the parties are to produce documents to include: (i) the most important custodians with knowledge of the issues framed by the pleadings, (ii) the custodians believed likely to have the most non-privileged documents responsive to the document requests, (iii) sufficient custodians to constitute a comprehensive production, and (iv) all persons who may be called at trial.¹ Because the pleadings have been narrowed, Intel has amended its Party Designated Custodian List previously provided to AMD in accordance with this objection and the Court's Order to delete those individuals selected to address the stricken allegations. A list of those individuals is set forth in Exhibit A to this response.

SPECIFIC OBJECTIONS AND RESPONSES

REQUEST FOR PRODUCTION NO. 1:

All studies, analyses, presentations or investigations concerning actual or potential competition faced by INTEL with respect to its MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production

¹ The stipulation also requires affirmance that a party has not failed to identify a custodian based on a belief that the custodian's documents would be harmful to its case.

Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 2:

All studies, analyses, presentations or investigations concerning the nature or size of the market for MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 3:

All studies, analyses, presentations or investigations concerning AMD's market share or market position with respect to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 4:

All studies, analyses, presentations or investigations concerning INTEL's market share or market position with respect to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 5:

All DOCUMENTS discussing, reflecting or constituting the terms of INTEL's sale of MICROPROCESSORS to any OEM, including but not limited to agreements, draft agreements, side letters, memoranda of understanding, memos, correspondence, internal analyses, sales meeting summaries, price lists, and invoices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for all paper "invoices" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any

particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing , Intel will produce responsive, non-privileged documents sufficient to show (i) the prices charged by Intel to foreign OEMs, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign OEMs.

REQUEST FOR PRODUCTION NO. 6:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any OEM concerning the sale, promotion and/or advertisement of MICROPROCESSORS and/or COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 7:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any OEM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and

asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign OEMs, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign OEMs.

REQUEST FOR PRODUCTION NO. 8:

All DOCUMENTS discussing, reflecting, constituting, analyzing, summarizing or describing any advertising and/or marketing support provided by INTEL to any OEM, including but not limited to invoices, canceled checks, correspondence, guidelines, conditions and/or agreements concerning MDF, Intel Inside, any other cooperative advertising support, or any other form of rebate or price discount provided by INTEL to any OEM in connection with advertising or marketing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that the demand for all paper "invoices" and "canceled checks" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by

such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce responsive, non-privileged documents sufficient to show market development funds or advertising support related to foreign customers.

REQUEST FOR PRODUCTION NO. 9:

All DOCUMENTS discussing, reflecting, constituting or describing the price of INTEL MICROPROCESSORS offered or sold to any OEM, including but not limited to price lists, price analyses, average selling price calculations, price negotiations and correspondence.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce responsive, non-privileged documents sufficient to show price lists, actual prices paid, rebates or other discounts, and average selling prices to foreign customers.

REQUEST FOR PRODUCTION NO. 10:

DOCUMENTS sufficient to show the actual or effective prices paid, accounting for all FINANCIAL INDUCEMENTS, by all OEMs for INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 11:

All DOCUMENTS constituting, discussing or reflecting any analysis of MICROPROCESSOR sales to OEMs, including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing , Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 12:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any OEM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these

objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign OEMs, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign OEMs.

REQUEST FOR PRODUCTION NO. 13:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any OEM regarding AMD, AMD MICROPROCESSORS and/or COMPUTER SYSTEMS containing AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 14:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any RETAILER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce responsive non-privileged documents sufficient to show discounts, rebates, market development funds, Intel Inside funds, or any other financial consideration from Intel to foreign retailers.

REQUEST FOR PRODUCTION NO. 15:

All DOCUMENTS discussing, reflecting, constituting or describing payments, commissions, or "spiffs" paid by RETAILERS to salespeople based on sales of COMPUTER SYSTEMS containing INTEL and/or AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties'

Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 16:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any RETAILER related to the allocation of shelf space or product placement in a RETAILER's stores.

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 17:

All DOCUMENTS discussing, reflecting, constituting, analyzing, summarizing or describing any advertising and marketing support provided by INTEL to a RETAILER, including but not limited to invoices, canceled checks, correspondence, guidelines, conditions, and agreements concerning MDF, Intel Inside, any other cooperative advertising support, or any other form of rebate or price discount provided by INTEL to any RETAILER in connection with advertising or marketing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that the demand for all paper "invoices" and "canceled checks" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign Distributors, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign Distributors.

REQUEST FOR PRODUCTION NO. 18:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any RETAILER concerning the stocking, advertising, promotion or sale of COMPUTER SYSTEMS containing AMD or INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties'

Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 19:

All DOCUMENTS constituting, discussing or reflecting any analysis of retail sales of COMPUTER SYSTEMS containing AMD or INTEL MICROPROCESSORS, including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 20:

All DOCUMENTS constituting, discussing or reflecting any analysis of direct internet sales of COMPUTER SYSTEMS containing AMD or INTEL MICROPROCESSORS, including but not limited to projections, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing,

Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 21:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any RETAILER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce responsive non-privileged documents sufficient to show discounts, rebates, market development funds, Intel Inside funds, or any other financial consideration from Intel to foreign retailers.

REQUEST FOR PRODUCTION NO. 22:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any RETAILER regarding AMD, AMD MICROPROCESSORS and/or COMPUTER SYSTEMS containing AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 23:

All DOCUMENTS discussing, reflecting or constituting the terms of INTEL's sale of MICROPROCESSORS to any DISTRIBUTOR, including but not limited to agreements, draft agreements, side letters, memoranda of understanding, memos, correspondence, internal analyses, sales meeting summaries, price lists, and invoices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for all paper "invoices" is unduly burdensome and overbroad. Intel does not intend to produce such documents. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27,

2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign distributors, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign distributors.

REQUEST FOR PRODUCTION NO. 24:

All DOCUMENTS constituting, discussing, reflecting or describing communications between INTEL and any DISTRIBUTOR concerning the sale, promotion and/or advertisement of MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 25:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered or provided by INTEL to any DISTRIBUTOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive

documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign Distributors, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign Distributors.

REQUEST FOR PRODUCTION NO. 26:

All DOCUMENTS discussing, reflecting, constituting, analyzing, summarizing or describing any advertising and/or marketing support provided by INTEL to any DISTRIBUTOR, including but not limited to invoices, canceled checks, correspondence, guidelines, conditions and/or agreements concerning MDF, Intel Inside, any other cooperative advertising support, or any other form of rebate or price discount provided by INTEL to any DISTRIBUTOR in connection with advertising or marketing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request on the grounds that the demand for all paper "invoices" and "canceled checks" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or

department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign Distributors, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign Distributors.

REQUEST FOR PRODUCTION NO. 27:

All DOCUMENTS discussing, reflecting, constituting or describing the price of INTEL MICROPROCESSORS offered or sold to any DISTRIBUTOR, including but not limited to price lists, price analyses, average selling price calculations, price negotiations and correspondence.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign Distributors, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign Distributors.

REQUEST FOR PRODUCTION NO. 28:

DOCUMENTS sufficient to show the actual or effective prices paid, accounting for all FINANCIAL INDUCEMENTS, by all DISTRIBUTORS for INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 29:

All DOCUMENTS constituting, discussing or reflecting any analysis of MICROPROCESSOR sales to or by DISTRIBUTORS, including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 30:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any DISTRIBUTOR.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign distributors, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign distributors.

REQUEST FOR PRODUCTION NO. 31:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any DISTRIBUTOR regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department

files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 32:

All DOCUMENTS discussing, reflecting or constituting the terms of INTEL's sale of MICROPROCESSORS to any ODM, including but not limited to agreements, draft agreements, side letters, memoranda of understanding, memos, correspondence, internal analyses, sales meeting summaries, price lists, and invoices.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the demand for all paper "invoices" is overly broad and unduly burdensome. Intel does not intend to produce such documents. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign ODMs, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign ODMs.

REQUEST FOR PRODUCTION NO. 33:

All DOCUMENTS constituting, discussing, reflecting, constituting or describing communications between INTEL and any ODM concerning the sale of MICROPROCESSORS and/or the design or development of COMPUTER SYSTEMS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 34:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign ODMs, including any discounts,

rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign ODMs.

REQUEST FOR PRODUCTION NO. 35:

All DOCUMENTS discussing, reflecting, constituting or describing the price of INTEL MICROPROCESSORS offered or sold to any ODM, including but not limited to price lists, price analyses, average selling price calculations, price negotiations, and correspondence.

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce responsive, non-privileged documents sufficient to show price lists, actual prices paid, rebates or other discounts, and average selling prices to foreign ODMs.

REQUEST FOR PRODUCTION NO. 36:

DOCUMENTS sufficient to show the actual or effective prices paid, accounting for all FINANCIAL INDUCEMENTS, by all ODMs for INTEL MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 37:

All DOCUMENTS constituting, discussing or reflecting any analysis of MICROPROCESSOR sales to ODMs including but not limited to projections, sales goals, forecasts, competitive analyses, market share analyses, revenue analyses and demand studies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 38:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any ODM.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 39:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any ODM regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, development, design, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 40:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any chipset manufacturer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department

files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign chipset manufacturers, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign chipset manufacturers.

REQUEST FOR PRODUCTION NO. 41:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any chipset manufacturer.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian. Without waiving Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will produce documents sufficient to show (i) the prices charged by Intel to foreign chipset manufacturers, including any discounts, rebates, lump sum payments, or other financial consideration that affects the price and (ii) market development funds, Intel Inside funds, or any other payments from Intel to foreign chipset manufacturers.

REQUEST FOR PRODUCTION NO. 42:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any chipset manufacturer regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, design, development, promotions, advertising, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 43:

All DOCUMENTS discussing, reflecting, constituting or describing any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT offered and/or provided by INTEL to any INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding

Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 44:

All DOCUMENTS discussing, reflecting, constituting or describing any consideration or suggestion by INTEL that it will or might withdraw or withhold any FINANCIAL INDUCEMENT or NON-FINANCIAL INDUCEMENT to any INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 45:

All DOCUMENTS constituting, discussing, reflecting or describing communications with any INTEL PARTNER regarding AMD and/or AMD MICROPROCESSORS, including but not limited to communications regarding sales, promotions, advertising, product launches, design, development, quality, price and revenue.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further

objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 46:

All DOCUMENTS prepared for or in connection with distribution to customers and prospective customers at any trade show.

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel also objects to this Request as overly broad and unduly burdensome, in part because it is not limited to the issues in this action. Intel also objects to this Request on the ground that it calls for information that is neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 47:

All DOCUMENTS constituting, analyzing or discussing business plans for INTEL's MICROPROCESSOR BUSINESS, including but not limited to plans for specific market segments, MICROPROCESSOR types, and/or specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 48:

All DOCUMENTS analyzing or discussing INTEL's and/or AMD's market share in the MICROPROCESSOR business, including but not limited to market share for specific market segments, MICROPROCESSOR types, and/or in specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 49:

All DOCUMENTS constituting, analyzing or discussing strategic plans, competitive analyses, sales forecasts, price elasticity studies, and market segmentation analyses related to INTEL or AMD's MICROPROCESSOR business.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 50:

All DOCUMENTS constituting, analyzing or discussing pricing analyses or pricing studies related to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 51:

All DOCUMENTS referring, relating, or pertaining to any INTEL analyst meeting, including but not limited to meeting transcripts, notes or minutes, pre-meeting mailings, and materials distributed at or during the meeting.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review

and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 52:

All presentations, conference calls, or other communications by INTEL representatives to financial analysts, industry forums, the press, or any other third parties that relate to microprocessors, your business or financial performance, or AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 53:

All DOCUMENTS referring, relating, or pertaining to any INTEL shareholder meeting, including but not limited to meeting transcripts, notes or minutes, pre-meeting mailings, and materials distributed at or during the meeting.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its

and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 54:

All DOCUMENTS constituting, reflecting or pertaining to press releases about INTEL MICROPROCESSORS, including but not limited to drafts of such releases, discussions about such drafts, final versions of such releases, and communications or discussions about such releases.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 55:

All DOCUMENTS discussing customer or consumer demand for MICROPROCESSORS, including but not limited to demand in specific market segments, by MICROPROCESSOR type, and/or in specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any

shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 56:

All DOCUMENTS analyzing, constituting, discussing, reflecting or referring to INTEL's sales goals, forecasts, projections and/or performance for INTEL's MICROPROCESSOR BUSINESS, including but not limited to specific market segments, MICROPROCESSOR types, and/or specific geographic regions.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, and without waiving its Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 57:

All DOCUMENTS analyzing, describing, or reflecting INTEL's platform strategy for *Centrino*, *VIII*, *East Fork*, and the *Digital Home Initiative*, including but not limited to the benefits to INTEL and potential harm to AMD.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its

and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 58:

All DOCUMENTS discussing, analyzing or referring to competition between OEMs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 59:

All DOCUMENTS discussing, analyzing or referring to competition between RETAILERS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 60:

All DOCUMENTS discussing, analyzing or referring to competition between DISTRIBUTORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 61:

All DOCUMENTS discussing, analyzing or referring to competition between ODMs.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 62:

All DOCUMENTS discussing, analyzing or referring to competition between INTEL, on the one hand, and AMD or any other MICROPROCESSOR manufacturer, on the other hand, with respect to MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive

documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 63:

All DOCUMENTS discussing, analyzing or referring to INTEL or AMD's capacity to manufacture MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 64:

All DOCUMENTS discussing or referring to INTEL's or AMD's ability, inability, capacity or lack of capacity to produce or supply MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 65:

All DOCUMENTS describing, analyzing or summarizing INTEL's actual or projected costs to design, manufacture, sell, distribute, promote or market (including but not limited to market development activities) INTEL MICROPROCESSORS, including but not limited to any such DOCUMENTS describing, analyzing or summarizing such costs with respect to any particular customer or customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 66:

DOCUMENTS sufficient to show all fixed asset or other capital expenditures relating to YOUR manufacture or sale of microprocessors, together with related depreciation and asset disposition schedules, from January 1, 1997 to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 67:

All budgets, forecasts, and projections concerning any of the actual or potential elements of the business of manufacturing or selling microprocessors including, but not limited to (1) costs and expenses, (2) sales in units or dollars, (3) gross and net profits, and (4) return on

investment associated with YOUR expenditures for the construction, or expansion, or contracting of production facilities.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 68:

All financial reports, studies or analyses of INTEL's MICROPROCESSOR business with respect to any particular customer or customers, including but not limited to financial reports, studies or analyses of INTEL's projected and/or actual profits or economic performance with respect to such customer or customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 69:

DOCUMENTS sufficient to describe the meaning, significance or protocols applicable to any color coding of any technical manual or specification provided by INTEL to any INTEL PARTNER.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to its General Objections, its Specific Objections, Intel will produce non-privileged documents sufficient to describe the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 70:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS shipped to or within the United States, broken down by date, customer and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 71:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS sold to customers incorporated in or with their principal place of business in the United States, broken down by date, customer, and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 72:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS shipped to or within California, broken down by date, customer and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 73:

DOCUMENTS sufficient to show the volume of INTEL MICROPROCESSORS sold to companies incorporated in or with their principal place of business in California, broken down by date, customer and MICROPROCESSOR model or type.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will produce non-privileged documents sufficient to show the requested information, to the extent such documents exist.

REQUEST FOR PRODUCTION NO. 74:

All studies, analyses, presentations or investigations concerning the profitability of INTEL's MICROPROCESSOR business, including but not limited to studies, analyses, presentations or investigations concerning the profitability of INTEL's MICROPROCESSOR business with individual customers.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to its General Objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its

and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 75:

All DOCUMENTS constituting, discussing or referring to any limitation or restriction on an INTEL customer's or INTEL PARTNER'S ability to purchase, promote, advertise, develop, design or sell AMD MICROPROCESSORS or products containing or compatible with AMD MICROPROCESSORS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Intel further objects to this Request on the grounds that the term "INTEL PARTNER" is overly broad, vague, ambiguous, and not subject to reasonable interpretation. Subject to these objections, Intel will conduct a diligent review and will produce all non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties' Stipulation Regarding Document Production Protocol, including files maintained by such Custodians on any shared server; and (ii) all of its and its subsidiaries' corporate or department files or databases, or other non-electronic files maintained by Intel outside the custody of any particular custodian.

REQUEST FOR PRODUCTION NO. 76:

All DOCUMENTS discussing, referring to or analyzing the combined or package sale of INTEL MICROPROCESSORS, INTEL chipsets and/or INTEL motherboards.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Intel's Objection Based on the Court's September 27, 2006 Ruling on Subject Matter Jurisdiction and Standing applies to this Request. In addition, Intel incorporates by reference and asserts each of its General Objections set forth above as if stated here in full. Subject to these objections, Intel will conduct a diligent review and will produce non-privileged, responsive documents and things contained in (i) the files of the designated Custodians as per the parties'